REMARKS

Claims 1-98 are pending in the application.

Claims 7-23, 30-43, 47-53, 60-75 and 82-98 over Li

In the Office Action, claims 7-23, 30-43, 47-53, 60-75 and 82-98 were rejected under 35 U.S.C. §102(e) as allegedly being anticipated by U.S. Patent No. 6,799,299 to Li et al. ("Li"). The Applicant respectfully traverses the rejection.

Claims 7-23, 30-43, 47-53, 60-75 and 82-98 respectively recite determining an address for uniquely locating an item of content to be extracted and a site mining address for locating an item of content in a source page.

The Office Action alleged that Li discloses an expression for uniquely locating an item of content to be extracted in Fig. 6 and at col. 5, line 51-col. 6, line 18.

Li appears to disclose a XSL stylesheet that contains a set of rules, each rule being present in each rule (See col. 5, lines 59-61). One part of a rule is pattern matching and an other part of the rule is action (See Li, col. 5, lines 59-61-62). The pattern matching is used to determine on which elements the action is to be performed, the pattern matching naming an element on which conversion is to be performed (See Li, col. 5, lines 62-66).

Thus, Li relies on pattern matching to determine on which elements an action is to performed. In contrast, Applicant's claimed features rely on an address. Pattern matching fails to disclose or suggest use of an address, much less determining an address for uniquely locating an item of content to be extracted and a site mining address for locating an item of content in a source page, as recited by claims 7-23, 30-43, 47-53, 60-75 and 82-98.

A benefit of determining an address for uniquely locating an item of content to be extracted and a site mining address for locating an item of content in a source page is, e.g., reduced computation to locate an item of content. Pattern matching by a computer is a relatively processor intensive operation that requires time to complete, the amount of time dependent on the type of processor used to perform the operation. In contract, use of an address requires

little to no processing by a processor an address directs a processor to an item of content. Thus, use of an address to locate an item of content requires fair less computational power from a processor to locate and speeds finding the item of content. The cited prior art fails to disclose or suggest the claimed features having such benefits.

Accordingly, for at least all the above reasons, claims 7-23, 30-43, 47-53, 60-75 and 82-98 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Claims 1-6, 24-29, 44-46, 54-59 and 76-81 over Li in view of Bickmore

In the Office Action, claims 1-6, 24-29, 44-46, 54-59 and 76-81 were rejected under 35 U.S.C. §103(a) as allegedly being obvious Li in view of U.S. Patent No. 6,857,102 to Bickmore et al. ("Bickmore"). The Applicant respectfully traverses the rejection.

Claims 1-6, 24-29, 44-46, 54-59 and 76-81 recite a system and method generating a **site template** to format a layout of a **stylesheet** based on capabilities of a mobile device.

The Examiner acknowledges that Li fails to disclose content selection and style manipulation are expressly performed based on the capabilities of a mobile device client (See Office Action, page 7). However, claims 1-6, 24-29, 44-46, 54-59 and 76-81 recite generating a site template to format a layout of a **stylesheet** based on capabilities of a mobile device. Thus, the deficiency in Li is that Li fails to disclose generating a site template to format a layout of a **stylesheet** based on capabilities of a mobile device, as recited by claims 1-6, 24-29, 44-46, 54-59 and 76-81.

As discussed above, the Examiner acknowledges that Li fails to disclose content selection and style manipulation are expressly performed based on the capabilities of a mobile device client (See Office Action, page 7). The Examiner relies on Bickmore to allegedly make up for the deficiencies in Li to arrive at the claimed features.

The Examiner alleges that Brickmore generating a <u>site template</u> based on capabilities of a mobile device and generating content and style transformation information based on capabilities of a mobile device in Figs. 1, 2, 11 and 16; and col. 3, line 55-col. 5, line 16.

Brickmore appears to disclose an automatic re-authoring system and method to re-author a document originally designed for display on a desktop computer screen for display on a smaller display screen, such as a PDA or a cellular telephone (Abstract). A document is defined as any set of information retrieved as a single entity from a distributed network, such as the Internet (See Brickmore, col. 6, lines 17-29).

Thus, Brickmore disclose automatic re-authoring of a document from the Internet. However, contrary to the Examiner allegation, Brickmore fails to even mention use of a <u>site template</u> and a <u>stylesheet</u>, much less a <u>site template</u> to format a layout of a <u>stylesheet</u>, much less a system and method generating a **<u>site template</u> to format a layout of a <u>stylesheet</u> based on capabilities of a mobile device**, as recited by claims 1-6, 24-29, 44-46, 54-59 and 76-81.

Thus, Li modified by Brickmore, even if such modification were obvious which it is not as discussed below, would <u>STILL</u> fail to disclose or suggest a <u>site template</u> to format a layout of a <u>stylesheet</u>, much less a system and method generating a **<u>site template</u> to format a layout of a <u>stylesheet</u> based on capabilities of a mobile device**, as recited by claims 1-6, 24-29, 44-46, 54-59 and 76-81.

Moreover, even if Brickmore disclosed use of a <u>site template</u> and a <u>stylesheet</u>, which as discussed above Brickmore fails to even mention, there is no suggestion within the prior art to modify Li with the disclosure of Brickmore. "Teachings of references can be combined <u>only</u> if there is some suggestion or incentive to do so." <u>In re Fine</u>, 5 USPQ2d 1596,1600 (Fed. Cir. 1988) (quoting <u>ACS Hosp. Sys. v. Montefiore Hosp.</u>, 221 USPQ 929, 933 (Fed. Cir. 1984)) (emphasis in original). The Examiner alleges that Li discloses transformation for various devices, such as a notebook, handheld or PDA (See Office Action, page
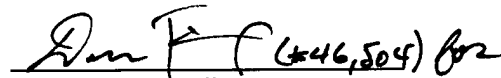
7). Thus, although Li recognized various devices having various capabilities, Li fails to even mention performing different types of transformations for different types of devices. Li fails to disclose or suggest any <u>NEED</u> to be modified to perform any function <u>based on capabilities of a mobile device</u>, with any such modification of Li based on <u>improper hindsight</u>.

Accordingly, for at least all the above reasons, claims 1-6, 24-29, 44-46, 54-59 and 76-81 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Conclusion

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,
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